CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Cathy Collins
Date: March 28, 1994

Background Facility Information

Facility Name: Peterson Builders, Inc.
EPA Identification No.: WID 096 828 975
Location (City, State): Sturgeon Bay, Wisconsin
Facility Priority Rank: Low

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Entire facility consisting of four SWMUs

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

( ) No corrective action activities initiated (Go to 5)
(X) RCRA Facility Assessment (RFA) or equivalent completed
( ) RCRA Facility Investigation (RFI) underway
( ) RFI completed
( ) Corrective Measures Study (CMS) completed
( ) Corrective Measures Implementation (CMI) begun or completed
( ) Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

( ) Operating permit
( ) Post-closure permit
( ) Enforcement order
(X) Other (Explain)

Corrective action has not been initiated.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

( ) Yes
( ) No
( ) Uncertain; still underway
(X) Not required

Additional explanatory notes:

Interim measures have not been officially required.

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

(X) None
( ) Groundwater
( ) Surface water
( ) Air
( ) Soils

6. Are contaminant releases migrating off-site?

( ) Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:
Surface water:
Air:
Soils:

(X) No
( ) Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

( ) Yes (Go to 8a)
(X) No
( ) Uncertain

Additional explanatory notes:

No history or suspicion of release has been documented at the facility.

7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

No history or suspicion of release has been documented at the facility.

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

( ) Yes (Go to 9)
(X) No
( ) Uncertain

Additional explanatory notes:

No history or suspicion of release has been documented at the facility.

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

No history or suspicion of release has been documented at the facility.

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

Interim measures have not been identified or planned.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

No history or suspicion of release has been documented at the facility.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

No history or suspicion of release has been documented at the facility.

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

( ) Solid
( ) Light non-aqueous phase liquids (LNAPLs)
( ) Dense non-aqueous phase liquids (DNAPLs)
( ) Dissolved in groundwater or surface water
( ) Gaseous
(X) Other None

13. Which of the following major chemical groupings are of concern at the facility?

(X) Volatile organic compounds (VOCs) and/or semi-volatiles
( ) Polynuclear aromatics (PAHs)
( ) Pesticides
( ) Polychlorinated biphenyls (PCBs) and/or dioxins
( ) Other organics
( ) Inorganics and metals
( ) Explosives
(X) Other Corrosives

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

( ) Yes; Indicate possible course of action.

(X) No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

No history or suspicion of release has been documented at the facility.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

( ) Yes
( ) No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

( ) Yes
( ) No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

( ) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

( ) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

( ) Yes
( ) No, not feasible
(X) No, not required
( ) Further investigation necessary

Explain final decision, using additional sheets if necessary.

The following information was obtained from a 1993 PA/VSI prepared by PRC Environmental Management, Inc.

No history or suspicion of release has been documented at the facility.

FYI
Pls. file w/the
PA/USI. Thanks
KH

Peterson Builders, Inc.
SHIP DESIGNERS
AND BUILDERS
STURGEON BAY, WISCONSIN 54235-0650
101 Pennsylvania Street, P.O. Box 650
(414) 743-5574
TELEX 26-3423
FAX (414) 743-6089

May 11, 1993

Mr. Kevin M. Peirard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

Re: HRE-8J
Visual Site Inspection
Peterson Builders, Inc.
Sturgeon Bay, Wisconsin
WID 096 828 975

Dear Mr. Pierard

Peterson Builders, Inc has reviewed the Preliminary Assessment/Visual Site Inspection report for our facility. We have identified one (1) error that we feel should be corrected to reflect the facts.

Page 13 second paragraph from the bottom indicates that 126.5 pounds of styrene per hour (WDNR,1989) may be released. This is incorrect as it is 126.5 pounds of resin that may be used. In addition resin of 35% styrene content may not volatilize more than 12%.

I am enclosing a copy of the WDNR Findings of Fact document which references this information.

If you have any questions, please call me at (414)743-5574, Ext. 450.

Sincerely yours,

Richard Propsom

Richard Propsom
Peterson Builders, Inc.
Environmental Dept.

Encl. WDNR Findings of Fact

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Tom Anders
Environmental Affairs Manager
Peterson Builders, Inc.
101 Pennsylvania Street
P.O. Box 650
Sturgeon Bay, Wisconsin 54235-0650

Re: Visual Site Inspection
Peterson Builders, Inc.
Sturgeon Bay, Wisconsin
WID 096 828 975

Dear Mr. Anders:

As indicated in the letter of introduction sent to you on March 30, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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HRE-8J

March 30, 1992

Tom Anders, Environmental Affairs Manager
Peterson Builders, Inc.
101 Pennsylvania Street
P.O. Box 650
Sturgeon Bay, Wisconsin 54235-0650

Re: Visual Site Inspection
Peterson Builders, Inc.
Sturgeon Bay, Wisconsin
ID No. WID 096 828 975

Dear Mr. Anders:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for 8:00 a.m. on Wednesday, April 22, 1992. The inspection team will consist of Kurt Whitman and Scott Storlid of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Wisconsin Department of Natural Resources

(WDNR) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Mark Gordon, WDNR

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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April 21, 1993

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WID 096 828 975

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If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

PETERSON BUILDERS, INC. STURGEON BAY, WISCONSIN WID 096 828 975

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	WID 096 828 975
Date Prepared	:	February 5, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087WI2H
Prepared by	:	PRC Environmental Management, Inc. (Kurt Whitman)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Peterson Builders, Inc. (Peterson) Plant 2 facility in Sturgeon Bay, Door County, Wisconsin (EPA ID No. WID 096 828 975). This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The Peterson facility manufactures boats and ships. The facility was also used to manufacture air transport industry trucks and small fiberglass boats. The facility generates and manages the following waste streams: spent freon 113 (F002); spent freon still bottoms (F002); spent pyridine and methanol mixture (D001, F005 and D038); spent xylene and glycol ether mixture (F003); spent xylene and methyl ethyl ketone mixture (D001, F003, F005, and D035); spent methylene chloride (F002); spent 1,1,1-trichloroethane and toluene mixture (D001, F003, F005 and D035); spent acetone (F003); nonhazardous dibasic esters (DBE) of dimethyl glutonate, dimethyl additate and dimethyl succinate; nonhazardous 1-methyl-2-pyrrolidinone; nonhazardous epoxy washwater; spent petroleum naptha (D001); waste corrosive cleaning solution (D002, D007 and D008); dioctyl phthalate (U028); nonhazardous cutting oil; aluminum dip tank desmutter waste (D002); and wood ash (unknown hazardous characteristics). Plant 1 of Peterson Builders Inc. location at 101 Pennsylvania Street, Sturgeon Bay, Wisconsin has transported hazardous wastes to this facility for container storage.

The facility has operated at its current location since 1965. The facility occupies 20.9 acres in a mixed-use area and employs about 35 people. The facility's current regulatory status is that of a large-quantity generator of hazardous waste. The facility was a hazardous waste treatment, storage, or disposal (TSD) facility before WDNR approved RCRA closure of the facility on March 27, 1992.

This facility has only one owner, except for Building Number 89 which was owned by Seville Organ Company until the early 1970's. The facility leases about 50 percent of Building Number 80 to two companies: (1) Microlift, Inc., a water purification equipment manufacturer and design firm, and (2) Marine Travel Lift, Inc., a boat lift manufacturer. PRC found no SWMUs or AOCs present at either of the lessee's operations.

The PA/VSI identified the following four SWMUs at the facility:

Solid Waste Management Units

1. Hazardous Waste Storage Area (HWSA)
2. Freon Distillation Unit (FDU)
3. Wood Ash Pile (WAP)
4. Satellite Accumulation Area (SAA)

Hazardous wastes are stored in the HWSA (SWMU 1) for less and 90 days. The FDU (SWMU 2) is used for the distillation and recovery of freon 113 (three to five times per year). The WAP (SWMU 3) was used for the open burning of wood and wood pallets. Peterson closed the HWSA (SWMU 1) in 1991, and underwent RCRA clean-closure which was approved by WDNR on March 27, 1992.

The PA/VSI did not identify any AOCs at the facility.

The potential for release from HWSA (SWMU 1), the FDU (SWMU 2), and the SAA (SWMU 4) to ground water, surface water, air and on-site soils is low. Peterson has adequate containment for these three SWMUs. The potential for release from the WAP (SWMU 3) to ground water, surface water, air and on-site soils is unknown. WAP (SWMU 3) is an unlined, wood ash pile sitting on top of a gravel parking lot. There are no release controls for the WAP (SWMU 3) present and the facility has not done any testing on this SWMU.

The City of Sturgeon Bay supplies all water to this facility from city wells. Ground water is used for drinking and industrial water. Ground water flows basically in an easterly direction. The nearest private drinking well is 0.2 mile downgradient and east of the facility. The nearest public water supply well is 0.4 mile upgradient and south of the facility.

Receptors of potential releases at this facility include Peterson personnel, personnel of nearby industries, and local residents. The drainage ditch located northeast of the facility may also be affected by a release from the facility. A residential area lies within 0.1 mile of the facility. The nearest surface water body is Sturgeon Bay, 0.8 mile east.

Sensitive environments include wetlands about 0.2 mile east of the facility. This is a broad leaf, forested wetland with Palustine wet soil.

PRC recommends no further action for SWMUs 1 through 4 at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Peterson Builders, Inc. (Peterson), Plant 2 facility in Sturgeon Bay, Wisconsin (EPA ID No. WID 096 828 975). The PA was completed on March 27, 1992. PRC gathered and reviewed information from Wisconsin Department of Natural Resources (WDNR), EPA Region 5 RCRA files, U.S. Geological Survey (USGS), Federal Emergency Management Agency (FEMA), U.S. Fish and Wildlife Service (USFWS), U.S. Department of Agriculture (USDA), and Wisconsin Geological and Natural History Survey (WGNHS). The VSI was conducted on April 22, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. Four SWMUs were identified at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and seven inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The Peterson facility is located at 101 East Walnut Street in Sturgeon Bay, Door County, Wisconsin (latitude 44° 48' 41"N and longitude 87° 22' 44"W), as shown in Figure 1. The facility occupies 20.9 acres in a mixed-use area.

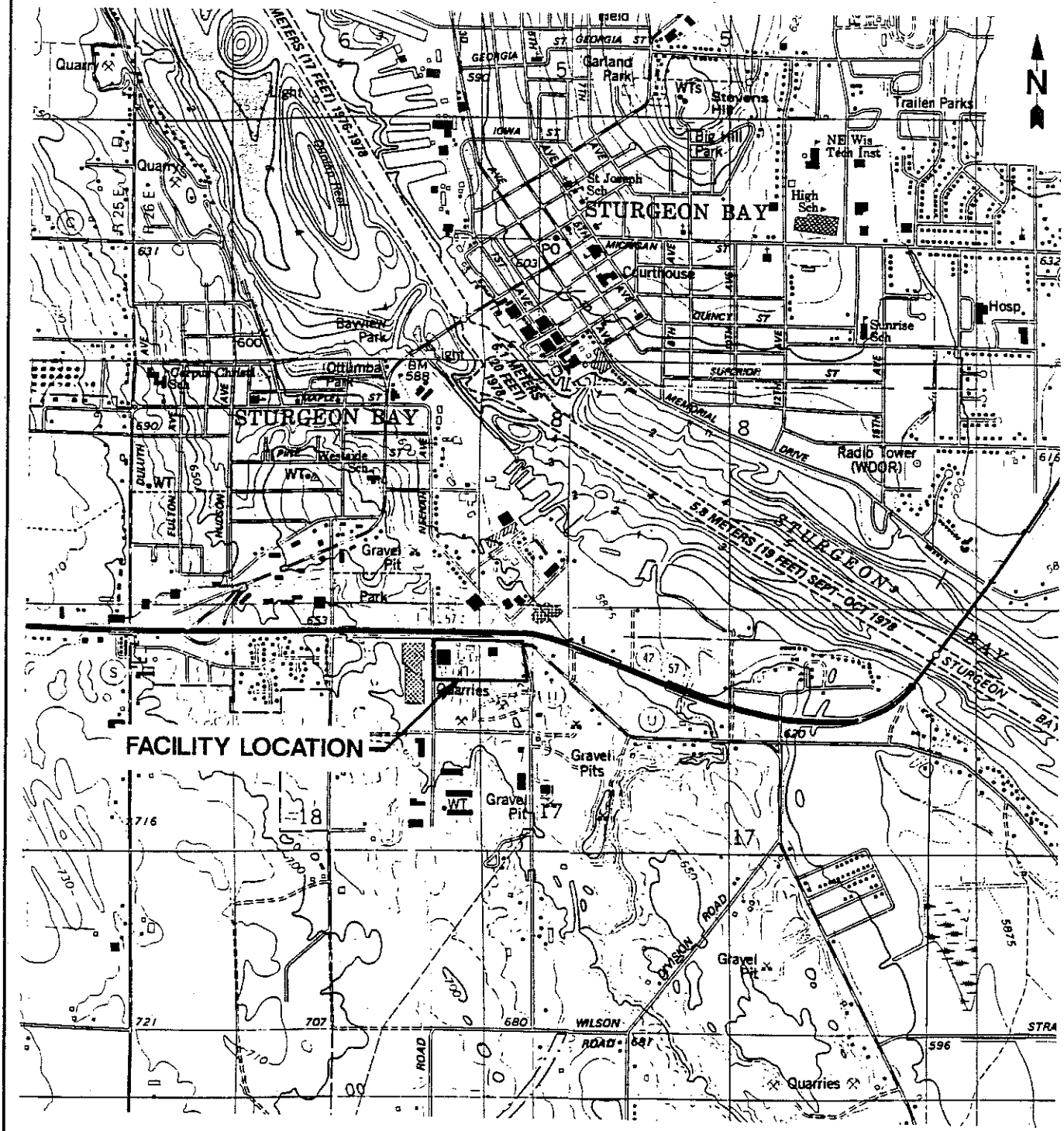
The Peterson facility is bordered on the north by East Walnut Street and Highway 57; on the west by South Neenah Street and Emerson Electric Company, an electrical components manufacturer; on the south by Sturgeon Bay Sand and Gravel Company, a gravel pit and quarry company; and on the east by South Oxford Avenue and a single residence.

2.2 FACILITY OPERATIONS

The Peterson facility has operated at its current location since 1965 and employs approximately 35 people. The facility manufactures boats and ships. The facility was also used to manufacture air transport industry trucks and small fiberglass boats. Raw materials used at the facility include acetone; methyl ethyl ketone; methylene chloride; xylene; toluene; dioctyl phthalate; freon 113; cutting oils; petroleum naphtha; corrosives, including phosphoric acid and fluoboric acid solutions; dibasic esters of dimethyl glutonate; dimethyl additate and dimethyl succinate; 1-methyl-2-pyrrolidinone; aluminum; fiberglass; epoxies; paints; wood; and steel.

Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

Eight buildings make up an area of the site known as Plant 2. Facility manufacturing activities are done in Buildings No. 80 and 85. Building No. 80 is used to store raw materials and contains an aluminum dip tank desmutter used to clean aluminum parts. Building No. 85 is used to manufacture fiberglass vessels and tanks and contains a satellite accumulation area for waste generated at this building. The five other buildings are used to warehouse raw materials (wood, steel, aluminum, moldings, paint, and other chemicals).



SOURCE: MODIFIED FROM USGS, STURGEON BAY EAST AND WEST QUADRANGLE, 1981

PETERSON BUILDERS, INC. PLANT 2
STURGEON BAY, WISCONSIN

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

Building No. 89 is used to store virgin, flammable materials as well as hazardous and solid wastes. The facility also has a bone yard south of Buildings No. 82, 83 and 85, which is used to store metal molds and standardized metal parts and equipment.

The square footage of each building at this facility is as follows: (1) Building No. 80 - 34,200 square feet; (2) Building No. 81 - 9,000 square feet; (3) Building No. 82 - 10,300 square feet; (4) Building No. 83 - 10,000 square feet; (5) Building No. 84 - 12,700 square feet; (6) Building No. 85 - 12,100 square feet; (7) Building No. 89 -12,100 square feet; and (8) Test Building - 500 square feet (Peterson, 1988a).

Building No. 80 was built in 1965 and the other seven buildings were constructed between 1966 and 1975. Building 89 was originally built by Seville Organ Company and sold to Peterson in the early 1970s. About 50 percent of Building No. 80 is leased to two tenants, MicroLift, Inc., a water purification equipment manufacturer and design firm, and Marine Travelift, Inc. (Marine), a manufacturer of boat lifts. Marine uses about 20 percent of Building No. 80 to spray paint boat lifts manufactured at another Marine location. During the VSI, there were no SWMUs or AOCs present at either lessee location.

2.3 WASTE GENERATION AND MANAGEMENT

The primary waste streams generated at the Peterson facility are: (1) freon 113, generated when hoses and pipes are flushed and still bottoms from a freon distillation/recovery unit; (2) spent solvents generated by the facility's quality assurance (QA) laboratory; (3) fiberglass, machinery and parts generated during cleanup; (4) unused fiberglassing chemicals; (5) lubricant used with metal machinery and parts; (6) hazardous waste shipped to the facility from Peterson's Plant 1 facility, also located in Sturgeon Bay, Wisconsin; (7) aluminum dip tank desmutter waste (Photograph No. 4) generated in Building No. 80; and (8) wood ash.

Wastes are generated and managed at various locations at the facility. SWMUs and their current status are identified in Table 1. The locations of SWMUs in relation to the facility layout are shown in Figure 2. Wastes generated at the facility are summarized in Table 2. Facility generation and management of both hazardous and nonhazardous wastes are discussed below.

The flushing of hoses and pipes results in the generation of about 3,675 pounds per year of spent freon 113 (F002). Spent freon 113 is stored in the Hazardous Waste Storage Area (HWSA) (SWMU 1) before it is distilled in the Freon Distillation Unit (FDU) (SWMU 2). Spent freon 113 still bottoms (F002) are generated at the FDU (SWMU 2) and are stored in the Hazardous Waste Storage Area (HWSA) (SWMU 1). About five pounds of spent pyridine and

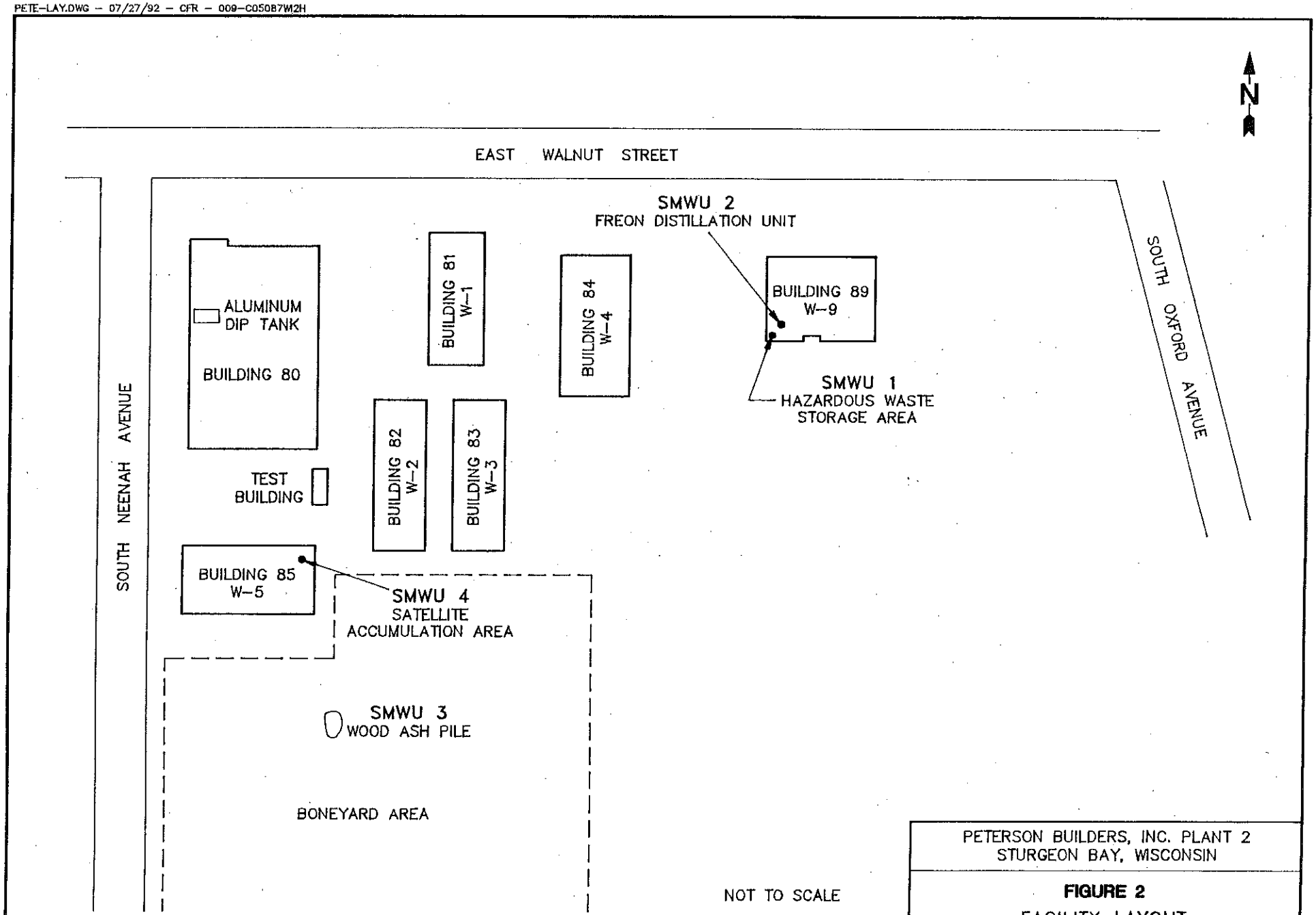
TABLE 1
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Hazardous Waste Storage Area (HWSA)	Yes	RCRA clean-closed in 1992, active for less than 90-day storage
2	Freon Distillation Unit (FDU)	No	Active, recycling of hazardous waste
3	Wood Ash Pile (WAP)	No	Active, storage of uncharacterized waste
4	Satellite Accumulation Area (SAA)	No	Active, satellite accumulation of hazardous waste

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

PETE-LAY.DWG - 07/27/92 - CFR - 009-C05087M2H



PETERSON BUILDERS, INC. PLANT 2
STURGEON BAY, WISCONSIN

FIGURE 2

FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: MODIFIED FROM PETERSON, 1981b

TABLE 2
SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Spent freon 113/F002	Hose and pipe cleaning operations	SWMUs 1 and 2
Spent freon still bottoms/F002	Solvent distillation	SWMUs 1 and 2
Spent pyridine and methanol mixture/D001, F005, and D038	QA Laboratory	SWMU 1
Spent xylene and glycol ether mixture/F003	Paint removal cleaning operations	SWMU 1
Spent xylene and methyl ethyl ketone mixture/D001, F003, F005, and D035	Fiberglass equipment cleaning operations	SWMU 1
Spent methylene chloride/F002	Fiberglass equipment cleaning operations	SWMUs 1 and 4
Spent 1,1,1-trichloroethane and toluene mixture/D001, F003, F005, and D035	Fiberglass equipment cleaning operations	SWMU 1
Spent acetone/F003	Fiberglass equipment cleaning operations	SWMU 1
DBE of dimethyl glutonate, dimethyl additate, and dimethyl succinate/NA	Fiberglass equipment cleaning operations	SWMUs 1 and 4
Spent 1-methyl-2-pyrrolidinone/NA	Fiberglass equipment cleaning operations	SWMUs 1 and 4
Spent epoxy washwater/NA	Fiberglass equipment cleaning operations	SWMU 1
Spent petroleum naphtha/D001	New equipment cleaning operations	SWMU 1
Waste corrosive cleaning solution/D002, D007, and D008	Circuit board cleaning operations	SWMU 1
Dioctyl phthalate/U028	Unused chemical	SWMUs 1 and 4
Cutting oil/NA	Lubricating operations	SWMU 1

TABLE 2 (continued)
SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Aluminum dip tank desmutter waste/D002	Dip tank cleaning operations	SWMU 1
Wood ash[b]	Burning of wood	SWMU 3

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

[b] Unknown hazardous characteristics

methane solvent mixture (D001, F005, and, D038) are generated by the facility's QA laboratory annually. This spent solvent mixture is stored in the HWSA (SWMU 1).

The removal of paint from mechanical parts results in the annual generation of 5,060 gallons of spent xylene and glycol ether mixture (F003) and 55 gallons of a spent xylene and methyl ethyl ketone mixture (D001, F003, F005, and D035). Both of these wastes are stored in the HWSA (SWMU 1).

The cleanup of fiberglass resin and equipment used in the manufacturing of fiberglass vessels results in the annual generation of: 10,458 pounds of spent methylene chloride (F002); 55 gallons of a spent 1,1,1-trichloroethane and toluene mixture (D001, F003, F005 and D035); 440 gallons of spent acetone (F003); 50 gallons of nonhazardous dibasic ester (DBE) mixture of dimethyl glutonate, dimethyl additate, and dimethyl succinate; 50 gallons of a spent nonhazardous 1-methyl-2-pyrrolidinone (M-Pyrol); and 55 gallons of spent nonhazardous epoxy washwater. Methylene chloride, DBE, and M-Pyrol are stored at building number 85's Satellite Accumulation Area (SAA) (SWMU 4) and will be stored in the HWSA (SWMU 1) when the drums are full. The other wastes are stored in the HWSA (SWMU 1).

The cleanup and removal of a protective coating on new equipment and parts results in the annual generation of 1,203 gallons of a spent petroleum naphtha (D001) stored in the HWSA (SWMU 1). The cleanup of circuit boards generates about 55 gallons of waste corrosive cleaning solution (D002, D007, and D008) annually which is stored in the (HWSA) (SWMU 1) (Peterson, 1992a, 1992b, and PRC, 1992a).

About 50 gallons of unused off-specification dioctyl phthalate (U028) is generated annually. This waste is accumulated in the SAA (SWMU 4) and is stored in the HWSA (SWMU 1). Lubrication of metal machinery and parts annually generates about 110 gallons of a nonhazardous water-based cutting oil which is stored in the HWSA (SWMU 1). In addition to the wastes generated at this facility, Peterson's Plant 1 has shipped the same types of solid and hazardous waste to the HWSA (SWMU 1) for storage (Peterson, 1992a and 1992b). The Plant 1 facility is located at 101 Pennsylvania Street, Sturgeon Bay, Wisconsin, (EPA ID No. WID 006 139 349).

Aluminum dip tank desmutter waste (D002) is generated every 2 to 3 years when the tank is cleaned. About 600 gallons of desmutter waste (phosphoric acid and water) was generated by the facility in 1990. This liquid corrosive waste was stored in the HWSA (SWMU 1). Between December 1990 and November 1991, the desmutter process was not in operation. In November

1991, the facility replaced the phosphoric acid and water solution from the desmutter process with fluoboric acid and water (Peterson, 1992b and PRC, 1992a).

Wood ash is generated when wood and wood pallets are burned in the bone yard. The hazardous characteristics of the wood ash is unknown. Raw materials and metal moldings are stored in the bone yard (see Photograph No. 7).

Wastes are transferred off site by Avganic Industries, Inc.; E&K Hazardous Wastes, Inc.; Laidlaw Environmental Services of Illinois, Inc.; and Safety-Kleen Corporation. All wastes are shipped off site to Avganic Industries, Inc. in Cottage Grove, Wisconsin; Laidlaw Environmental Services of Illinois, Inc., in Pecatonica, Illinois; Chem Central, Inc., in Chicago, Illinois; Ensco, Inc., in El Dorado, Arkansas; and Safety-Kleen Corporation, in Kaukauna, Wisconsin (Peterson, 1992a and 1992b).

2.4 HISTORY OF DOCUMENTED RELEASES

There are no documented releases to environmental media at this facility.

2.5 REGULATORY HISTORY

Peterson submitted a Notification of Hazardous Waste Activity form to EPA on November 19, 1980 (Peterson, 1980). The facility submitted a RCRA Part A permit application on July 23, 1981 (Peterson, 1981a). Container storage (S01) was the only process code listed. The process design capacity was specified as 11,000 gallons. Spent solvents (F005) were the only wastes listed. The facility submitted revisions to the RCRA Part A permit application on November 4, 1981 (Peterson, 1981b) and April 20, 1983 (Peterson, 1983a).

In early 1982, the facility received an EPA Administrative Complaint for failing to submit a timely RCRA Part A permit application. On July 27, 1982, the facility signed an EPA consent agreement and final order for failing to submit the RCRA Part A permit application (EPA, 1982).

The facility was issued a WDNR interim hazardous waste license on May 9, 1983 (WDNR, 1983a). A RCRA Part B permit application was submitted in 1983 and approved by EPA and WDNR in 1984 (Peterson, 1983b, and EPA, 1987). The facility requested a RCRA Part B permit modification in 1985 (Peterson, 1985) and was granted approval to the modification in 1986 (EPA, 1986). Between 1986 and 1988 the facility operated under a 2 year hazardous waste operating license issued by the EPA and WDNR. The facility was issued a one-year hazardous

waste operating license by WDNR effective September 30, 1988 (WDNR, 1988a) which was last reissued in 1991 by WDNR for two more years.

The facility sent a Notification of Hazardous Waste Activity to EPA in December 1983 listing another facility location as the "corner of Walnut and Lansing" under the EPA identification number WID 980 898 399. On August 29, 1988, the facility sent a letter to EPA requesting that this EPA identification number WID 980 898 399 be deactivated because this number and the facility location were contiguous with the facility's generator identification number WID 096 828 975 (Peterson, 1988b). Generator identification number WID 980 898 399 was deactivated by EPA in 1991 (EPA, 1991).

On April 23, 1991, Peterson submitted a letter notifying WDNR of its intent to close this hazardous waste storage facility located at 107 East Walnut Street (generator identification number WID 096 828 975) (Peterson, 1991a). WDNR approved RCRA-clean closure on March 27, 1992 (WDNR, 1992). The facility is currently a large-quantity generator for less than 90-day storage of hazardous wastes (PRC, 1992b).

In the past, the facility has violated RCRA regulations. On ten different occasions WDNR inspections resulted in notices of noncompliance or notices of violation for financial responsibility, closure plans, training, inadequate drum labeling, contingency plan, waste determination, and annual reporting deficiencies (WDNR, 1983b, 1983c, 1983d, 1985, 1986, 1987a, 1987b, 1988b, 1988c, and 1991).

The facility closed the HWSA (SWMU 1) in 1991 (Peterson, 1991b). WDNR approved the RCRA-clean closure of HWSA (SWMU 1) on March 27, 1992 (WDNR, 1992). The facility currently operates as a large-quantity generator storing wastes for less than 90 days.

The facility was issued findings of fact, and conclusions of law and order stating that Peterson must use the latest available control techniques for styrene air emissions and cannot exceed 126.5 pounds of styrene per hour (WDNR, 1989). As long as the facility does not exceed 126.5 pounds of styrene per hour, an air permit is not required. The facility has no history of odor complaints from area residents.

The facility is required to have a Wisconsin Pollutant Discharge Elimination System (WPDES) permit for runoff. Peterson submitted a stormwater application for WPDES permit in late 1991 (Peterson, 1992b). The facility does not have any sanitary sewer pretreatment discharge permits.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Peterson facility.

2.6.1 Climate

The climate in Door County is continental. The lowest average daily temperature is 10.2°F in February. The highest average daily temperature is 80.1°F in July.

The total annual precipitation for the county is 27.20 inches. The 1-year, 24-hour maximum rainfall is 4.57 inches (USDA, 1978). The mean annual lake evaporation rate is 26 inches (U.S. Department of Commerce, 1968).

The prevailing winds are from the northwest and southwest except in early spring when northeast winds are predominant (USDA, 1978).

2.6.2 Flood Plain and Surface Water

The Peterson facility is not located in a flood plain (FEMA, 1991). The nearest surface water body, Sturgeon Bay, is located 0.8 mile east of the facility and is used for recreational, industrial, and municipal purposes. This surface water body is connected to Green Bay on the west and Lake Michigan on the east.

Surface water drainage at the facility is to the east toward Sturgeon Bay. The facility is level and drainage is probably minimal. There is a quarry immediately south and adjacent to the facility. This quarry has a drainage ditch that flows east toward Sturgeon Bay.

Green Bay is located about 5.7 miles west of the facility and Lake Michigan is about 3.5 miles east of the facility (USGS, 1981). The nearest wetland is located about 0.2 mile east of the facility (USFWS, 1987).

2.6.3 Geology and Soils

Soils at the facility are classified by the USDA as Longrie. The upper 3 inches are black loam. The subsurface soil is a dark grayish brown, sandy loam that is about 2 inches thick (USDA, 1978).

Bedrock occurs immediately beneath glacial deposits and clay (60 feet to 428 feet below ground surface). The bedrock is Silurian-age undifferentiated dolomite. Well logs in the area contain confirming descriptions of glacial deposits and clay underlain by gray dolomite (WGNHS, 1992).

Ordovician-age formations underlie the Silurian-age undifferentiated dolomite. The uppermost or Ordovician-age formation is Maquoketa Shale, an aquitard, which is about 420 feet thick. This unit is underlain by the Sinnippee Group, consisting of Galena, Decorah Formation, and Platteville Formation dolomites. The Sinnippee Group is about 200 feet thick. Underlying the Sinnippee Group is the St. Peter Sandstone. The St. Peter Formation is about 180 feet thick and is the most commonly used sandstone aquifer. The Prairie Du Chien Formation, which is about 100 feet thick and underlies the St. Peter Formation, is commonly used in combination with the sandstone aquifer.

A Cambrian sandstone formation, undifferentiated, up to 240 feet thick, underlies the Prairie Du Chien formation. Cambrian sandstone formations do not yield much water. The Cambrian sandstone formations are underlain by the Precambrian-age crystalline rock, consisting mainly of quartzite (USDA, 1978 and USGS, 1973).

2.6.4 Ground Water

There are three major sources of ground water in Door County. These sources include the glacial sand and gravel aquifer; Niagara dolomite aquifer; and the Ordovician and Cambrian Sandstone (Sandstone) aquifer, which includes St. Peter and Prairie Du Chien Group sandstone. The glacial sand and gravel aquifer well depths range from 60 to 428 feet. The Niagara dolomite aquifer well depths range from 75 to 300 feet, and the Sandstone aquifer well depths range from about 1,000 to 1,800 feet below ground surface.

Ground-water movement is basically from west to east towards Lake Michigan for all three aquifers (USGS, 1973). Local well logs for locations within 2.0 miles of the facility show that ground-water levels range from 16 to 38 feet below ground surface. Three local wells within 2.0 miles were drilled into the dolomite formation. These well logs indicate the presence of topsoil and glacial till from 0 to 60 feet, and dolomite from 60 feet to the bottom of the wells which range from 249 feet to 428 feet (WGNHS, 1992).

2.7 RECEPTORS

The facility occupies 20.9 acres in a mixed-use area in Sturgeon Bay, Wisconsin. Sturgeon Bay has a population of about 9,200.

The facility is bordered on the north by East Walnut Street and Highway 57; on the west by South Neenah Street and Emerson Electric Company, an electrical components manufacturer; on the south by Sturgeon Bay Sand and Gravel Company, a gravel pit and quarry company; and on the east by South Oxford Street and a residence located about 0.2 mile east of the facility. The nearest school, Westside School, is located about 0.5 mile north of the facility. Facility access is controlled by locking each building at the end of the work day. The bone yard area south of Buildings No. 82, 83, and 85 is controlled by a chain-link fence with a locked gate.

The nearest surface water body, Sturgeon Bay, is 0.8 mile east of the facility and is used for recreational, industrial, and municipal purposes. Other surface water bodies in the area include Green Bay, located 7.0 miles west of the facility, and Lake Michigan, located 3.5 miles to the east of the facility.

Ground water is used as a drinking and industrial water supply in the area. Water for the facility is supplied by the City of Sturgeon Bay's ground water wells. The nearest private drinking water well is 0.2 mile downgradient and east of the facility. The nearest public water well supply is 0.4 mile upgradient and south of the facility. There are no known industrial water wells located within 2.0 miles of the facility.

Sensitive environments are not located on site. The nearest wetland area is located 0.2 mile east of the facility. This is a broad-leaf, forested wetland with Palustine wet soil.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the four SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC observations. Figure 2 shows the SWMU locations.

SWMU 1 **Hazardous Waste Storage Area (HWSA)**

Unit Description: The HWSA is located indoors and above ground in Building No. 89. The unit is used to store drums of hazardous and solid wastes generated by Plant 2 and drums sent from Plant 1. These drums are stored for less than 90 days. The unit measures 43 feet by 24 feet. The unit is made of a sunken concrete floor. The walls and ceiling are made of steel and aluminum. There are no floor drains in this area (see Photographs No. 1 and 2).

Date of Startup: This unit began operation in 1978.

Date of Closure: The facility underwent RCRA closure on March 27, 1992, and is active for less than 90-day storage.

Wastes Managed: This unit manages hazardous and nonhazardous wastes including spent freon 113 (F002); spent freon 113 still bottoms (F002); spent pyridine and methanol mixture (D001, F005, and D038); spent xylene and glycol ether mixture (F003); spent xylene and methyl ethyl ketone mixture (D001, F003, F005, and D035); spent methylene chloride (F002); spent 1,1,1-trichloroethane and toluene mixture (D001, F003, F005, and D035); spent acetone (F003); nonhazardous DBE of dimethyl glutonate, dimethyl additate, and dimethyl succinate; nonhazardous 1-methyl-2-pyrrolidinone; nonhazardous spent epoxy washwater; spent petroleum naphtha (D001); waste corrosive cleaning solution/D002, D007, and D008; dioctyl phthalate (U028); nonhazardous cutting oil; and aluminum dip tank desmutter (D002). These wastes are stored in 55-gallon drums. Wastes from this unit are ultimately sent off site for disposal.

Release Controls:	The unit has a bermed, concrete barrier that surrounds its outside edge. There is a sprinkler system built into the ceiling, and the concrete floor is sealed with epoxy.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	During the VSI, the unit contained flammable raw materials used in manufacturing operations as well as one drum of spent methylene chloride (F002), one drum of circuit board cleaner (D002, D007 and D008), one drum of nonhazardous epoxy washwater, and two drums of nonhazardous water based cutting oil. There are no visible cracks in the concrete. This unit appears to have sound containment. No evidence of release was noted.
SWMU 2	**Freon Distillation Unit (FDU)**
Unit Description:	The FDU is located in Building No. 89, adjacent to the HWSA. It is above ground and indoors. The unit is used for the distillation and reclamation of freon 113 (F002). The unit measures about 5.5 feet high and 8 feet wide. The unit is made of a metal distillation unit with vapor controls (see Photographs No. 1 and 3).
Date of Startup:	This unit began operation in 1983.
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages freon 113 (F002). Freon 113 still bottom wastes (F002) from this unit are stored in the HWSA (SWMU 1).
Release Controls:	This unit has a sprinkler system in place, and a concrete floor sealed with epoxy. There are no floor drains in this area.
History of Documented Releases:	No releases from this SWMU have been documented.

Observations:	During the VSI, the unit contained a freon distillation unit that was not in operation. There were no visible cracks in the concrete. No evidence of release was noted.
SWMU 3	**Wood Ash Pile (WAP)**
Unit Description:	The WAP is located outdoors, above ground, and north of Building Nos. 82, 83, and 85. This unit was used to burn wood and wood pallets. The unit measures about 8 feet by 12 feet. The unit is made of burned wood and ashes on a gravel parking lot. The parking lot is level and drainage is minimal (see Photograph No. 6).
Date of Startup:	This unit began operating about 1983.
Date of Closure:	The unit has been inactive since 1991.
Wastes Managed:	This unit manages burned wood and ash. Wastes are still stored in the unit.
Release Controls:	The unit has no release controls.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	During the VSI, the unit contained snow, ice, mud, wood ash, and debris, overlying a gravel parking lot.
SWMU 4	**Satellite Accumulation Area (SAA)**
Unit Description:	The SAA is located in Building No. 85. It is above ground and indoors. The unit is used for the satellite accumulation of drums of waste generated during the molding of fiberglass vessels and subsequent cleaning operation.
Date of Startup:	This unit began operation in about 1974.
Date of Closure:	The unit is active.

Wastes Managed:	This unit manages spent methylene chloride (F002); nonhazardous DBE esters of dimethyl glutonate, dimethyl addidate and dimethyl succinate, nonhazardous 1-methyl-2-pyrrolidinone, and dioctyl phthalate (U028). All wastes are sent to the HWSA (SWMU 1) for storage and then transported off-site for disposal.
Release Controls:	The unit has an unsealed concrete floor. There are no floor drains in this area.
History of Documented Release:	No releases from this SWMU have been documented.
Observations:	During the VSI, the unit contained one drum of spent methylene chloride (F002), one drum of nonhazardous DBE of dimethyl glutonate, dimethyl additate, and dimethyl succinate, one drum of dioctyl phthalate (U028) and one drum of M-Pyrol. None of the drummed wastes were full. PRC observed no cracks in the concrete and no evidence of release. (see Photograph No. 5).

4.0 AREAS OF CONCERN

PRC did not identify any AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified four SWMUs at the Peterson facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, located at the end of this section, summarizes the SWMUs at the Peterson facility and recommended further actions.

SWMU 1 **Hazardous Waste Storage Area (HWSA)**

Conclusions: This SWMU has adequate containment for spills because it is indoors and has an epoxy sealed, concrete floor. This unit was RCRA closed in 1992, and is active for less than 90-day storage. The unit has an low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action at this time.

SWMU 2 **Freon Distillation Unit (FDU)**

Conclusions: This SWMU was not in use at the time of the VSI and is used irregularly by the facility. It has adequate containment and is indoors. The unit has an low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action at this time.

SWMU 3 **Wood Ash Pile (WAP)**

Conclusions: The unit has a low potential for release to ground water, surface water, air, and on-site soils because the WAP is not RCRA-regulated and is not known to contain hazardous constituents or hazardous wastes.

Recommendations: PRC recommends no further action at this time.

SWMU 4 **Satellite Accumulation Area (SAA)**

Conclusions: This SWMU has adequate containment for spills because it is indoors and has concrete floors. This unit has a low potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU at this time.

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Hazardous Waste Storage Area	About 1978 to Present	None	None
2. Freon Distillation Unit	About 1983 to Present	None	None
3. Wood Ash Pile	About 1983 to Present	None	None
4. Satellite Accumulation Area	About 1974 to Present	None	None

REFERENCES

Federal Emergency Management Agency (FEMA), 1991. Flood Insurance Rate Map, Community - Panel No. 550111 0005B, City of Sturgeon Bay, Wisconsin, August 5.

Peterson Builders, Inc. (Peterson), 1980. Notification of Hazardous Waste Activity Form Filed November 19.

Peterson, 1981a. RCRA Part A Permit Application, July 23.

Peterson, 1981b. Revised RCRA Part A Permit Application and Variance Request Form, November 4.

Peterson, 1983a. Letter from John Beales to James Reyburn, Wisconsin Department of Natural Resources (WDNR), April 20.

Peterson, 1983b. Letter from John Beales to Richard Karl, U.S. Environmental Protection Agency (EPA), May 27.

Peterson, 1985. Letter from John Beales to Don Johnston, WDNR, November 15.

Peterson, 1988a. Hazardous Waste Contingency Plan for Peterson, October 25.

Peterson, 1988b. Letter from Don Johnston to Sharon Kider, EPA, August 29.

Peterson, 1991a. Letter from Charles St. Pierre to Len Polczinski, WDNR, April 23.

Peterson, 1991b. Letter from Tom Anders to Len Polczinski, WDNR, November 11.

Peterson, 1992a. 1991 Hazardous Waste Report Identification and Certification, February 25.

Peterson, 1992b. Conversation with Rich Propsom and Tom Anders, and Kurt Whitman, PRC Environmental Management, Inc. (PRC).

PRC, 1992a. Record of Telephone Conversation between Kurt Whitman and Richard Propsom, Peterson, May 15.

PRC, 1992b. Record of Telephone Conversation between Kurt Whitman and Richard Propsom, Peterson, July 9.

U.S. Department of Agriculture (USDA), 1978. Soil Survey of Door County, Wisconsin, December.

U.S. Department of Commerce, 1968. Climatic Atlas of the United States, Mean Annual Lake Evaporation.

U.S. EPA, 1982. Letter from Bill Miner to Ellsworth Peterson, Peterson, August 2.

U.S. EPA, 1986. Letter from Basil Constantelos to John Beales, Peterson, September 30.

U.S. EPA, 1987. Summary of Corrective Action Review for Peterson RCRA Part B Permit Application, January 8.

U.S. EPA, 1991. Letter from Arthur S. Kawatchi to Don Johnson, Peterson, April 22.

U.S. Fish and Wildlife Service, 1987. National Wetlands Inventory Map for Door County, Township 27 North, Range 26 East, April.

U.S. Geological Survey (USGS), 1973. Water Resources of Wisconsin - Lake Michigan Basin, Hydrologic Investigations Atlas HA-432.

USGS, 1981. 7.5-Minute Quadrangle Maps, Sturgeon Bay East and West.

WDNR, 1983a. Letter from Douglas Rossberg to Gary Higgens, Peterson, May 9.

WDNR, 1983b. Letter from George Kraft to John Beales, Peterson, February 17.

WDNR, 1983c. Letter from James Reyburn to John Beales, Peterson, April 27.

WDNR, 1983d. Letter from Donald Johnston to John Beales, Peterson, October 17.

WDNR, 1985. Letter from Donald Johnston to John Beales, Peterson, January 9.

WDNR, 1986. Letter from Donald Johnston to John Beales, Peterson, February 27.

WDNR, 1987a. Letter from Donald Johnston to John Beales, Peterson, January 15.

WDNR, 1987b. Hazardous Waste Compliance Monitoring and Enforcement Summary for Peterson, December 1.

WDNR, 1988a. Letter from Paul Didier to Don Johnston, Peterson, September 27.

WDNR, 1988b. Letter from A. Nichol Mamolou to Don Johnston, Peterson, July 20.

WDNR, 1988c. Letter from A. Nichol Mamolou to Don Johnston, Peterson, August 22.

WDNR, 1989. Findings of Fact, Conclusions of Law and Order for Peterson Builders, Inc., June 12.

WDNR, 1991. Letter from Len Polczinski to Richard Propsom, Peterson, March 18.

WDNR, 1992. Letter from Len Polczinski to Tom Anders, Peterson, March 27.

Wisconsin Geological and Natural History Survey (WGNHS), 1992. Well and Geological Logs for Sturgeon Bay, Wisconsin, Township 27 North, Range 26 East, Sections 7, 8, and 18.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
WI	WID 096 828 975

II. SITE NAME AND LOCATION

01 SITE NAME *(Legal, common, or descriptive name of site)*	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER				
Peterson Builders, Inc.	107 East Walnut Street				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Sturgeon Bay	WI	54325	Door	55029	8
09 COORDINATES: LATITUDE	**LONGITUDE**				
44°48'41" N	87°22'44"W				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*
Take Highway 57 North towards Sturgeon Bay to the corner of Highway 57 and South Oxford Avenue. Turn right (south) to the first intersection, which is East Walnut Street (less than 0.5 blocks south) and turn right to the facility.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
Peterson Builders, Inc.	101 Pennsylvania Street		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Sturgeon Bay	WI	54235	(414) 743-5574
07 OPERATOR *(If known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
Same			
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**

13 TYPE OF OWNERSHIP *(Check one)*
■ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency Name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*
■ A. RCRA 3010 DATE RECEIVED: 11 /19 /80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
■ YES ☐ NO DATE 4/22/92
BY *(Check all that apply)*
☐ A. EPA ■ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*
CONTRACTOR NAME(S): PRC Environmental Management, Inc. (PRC)

02 SITE STATUS *(Check one)*
■ A. ACTIVE ☐ B. INACTIVE ☐ C.UNKNOWN

03 YEARS OF OPERATION
1965 (BEGINNING YEAR) | Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Spent freon 113 (F002); spent freon 113 still bottoms; spent pyridine and methanol mixture (D001, F005, and D035); spent xylene mixture (F003); spent methylene chloride (F002); spent 1,1,1-trichloroethane and toulene mixture (D001, F003, F005, and D035); waste corrosive cleaning solution (D002, D007, and D008); dioctyl phthalate (U028); spent petroleum naphtha (D001); spent acetone (F003); and aluminum dip tank desmutter (D002).

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

If a fire occurred, the potential hazards could include a hazardous substance or waste release to air or on-site soils. Residential populations lie within 0.1 mile of the facility.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ■ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*		03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA		(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Kurt Whitman		PRC	(414) 821-5894	07/27/92

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Peterson Builders, Inc.
Sturgeon Bay, Wisconsin
WID 096 828 975

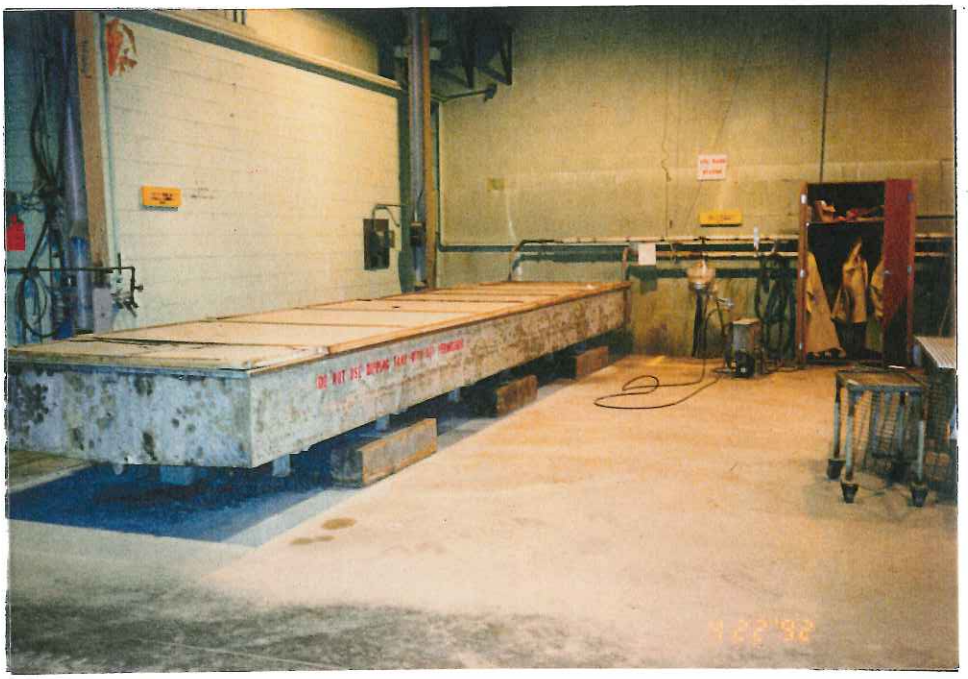
Date:	April 22, 1992
Facility Representatives:	Tom Anders, Environmental Manager Rich Propsom, Environmental Engineer
Inspection Team:	Kurt Whitman, PRC Environmental Management, Inc. (PRC) Scott Storlid, PRC
Photographer:	Kurt Whitman
Weather Conditions:	Windy, overcast, temperature about 39°F
Summary of Activities:	The visual site inspection (VSI) began at 12:55 p.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the Peterson facility's past and current operations, solid wastes generated, and release history. Most of the information was exchanged on a question-and-answer basis. Peterson representatives provided the inspection team with copies of the documents requested. The VSI tour began at 1:00 p.m. PRC inspected all areas of the facility. The inspection team observed the Hazardous Waste Storage Area (HWSA) (SWMU 1) located in Building No. 89. The Freon Distillation Unit (FDU) (SWMU 2) is located adjacent to the HWSA (SWMU 1). The FDU was not in operation at the time of the VSI. PRC inspected Building No. 80, where the aluminum dip tank desmutter is located. PRC inspected Building No. 85 and observed four drums of waste stored in the Satellite Accumulation Area (SWMU 4). PRC then observed the Wood Ash Pile (WAP) (SWMU 3). The tour concluded at 2:10 p.m., after which the inspection team held an exit meeting with Peterson representatives. The VSI was completed and the inspection team left the facility at 2:15 p.m.

Photograph No. 1
Orientation: Southeast
Location: Building No. 89
Date: 04/22/92
Description: This is a photograph of the building that the HWSA (SWMU 1) and FDU (SWMU 2) are located in.

Photograph No. 2
Orientation: Southwest
Location: SWMU 1
Date: 04/22/92
Description: This is a photograph of the drums stored in the HWSA (SWMU 1).

Photograph No. 3
Orientation: East
Description: This is a photograph of the FDU (SWMU 2).

Location: SWMU 2
Date: 04/22/92



Photograph No. 4
Orientation: Southwest
Description: This is a photograph of the aluminum dip tank desmutter.

Location: Building No. 85
Date: 04/22/92

Photograph No. 5
Orientation: North
Location: Building No. 80
Date: 04/22/92
Description: This is a photograph of the satellite accumulation area in Building No. 85.

Photograph No. 6
Orientation: Southwest
Location: SWMU 3
Date: 04/22/92
Description: This is a photograph of the wood ash pile.

Photograph No. 7 Location: Bone Yard
Orientation: South Date: 04/22/92
Description: This is a photograph of the bone yard showing all of the equipment and raw materials stored outside.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

4/22/92

PETERSON BUILDERS, INC.

~~WHAR~~ WAREHOUSE 9
107 E. WALNUT ST., STURGEON BAY, WI.
OVERCAST, INTERMITTENT DRIZZLE, ≈40°F, WINDS SE 5-10 mph

1228 - arrive at facility, begin observation of adjacent land use
- facility in an mixed use area

1248 - MEET W/
PBI
- RICH PROPSOM, ENV. ENGINEER
- TOM ANDERS, ENV. MNGR.

1250 BEGIN VSI AT WAREHOUSE 9
SITE OF FORMER STORAGE

1251 - VIEW FREON STILL

1258 - VIEWED FORMER STORAGE
1 55-GAL. DRUM
1 DRUM METHYL CHLORIDE
1 DRUM EPOXY WASTE
2 DRUMS CUTTING OIL
- WATER BASED,
- 1 DRUM CIRCUIT BOARD WASTE WATER - TESTED HAZARDOUS
- ROOM HAS SEALED CONCRETE FLOOR, CONCRETE BERMED
- THE REST OF WAREHOUSE 9 IS PRODUCT & RAW MATERIAL STORAGE

1313 ENTER PRODUCTION AREA, PLANT 2

- 20.9 Acres, land, numerous scrapyards, production facility
- parts of PLANT 2 are leased out to MICROLIFT a water treatment design facility, and MARINE TRAVEL LIFT, painters of fine engines

1316 begin Irving production area.
- manufacture and assembly of fiberglass boat parts
- historically a manufacturer of entire boats, pay-loaders for aircraft carriers.

fiberglass comes in as rolls and is cut, unrolled and sent to assembly, no waste from cutting - it is used for patching at other areas,

1325 MICROLIFT.
~~MICROLIFT~~

1330 MARINE TRAVEL LIFT - paint fine engine parts, ~~their waste is managed through their main plant~~ in ST. BAY.

1333 - fiberglass assembly area - WS building

fiberglass comes here, is applied to a frame and epoxy resins ~~on~~ or polyester resins are applied. The pieces are then dried.

wastes from assembly area - methylenchloride, acetone, DBE,

- methylene chloride is used to clean the spray guns, so waste is a mix,

- satellite accumulation area - 1 drum M.C. 1 drum acetone, 1 drum DBE, 1 monkey drum.

- have an open administrative order.

- no drain in this building, there is a drain in the cutting area

methylene chloride = F001

- waste from Plant 1 is stored at WAREHOUSE 9.

1415 - wrap up interview, no questions.

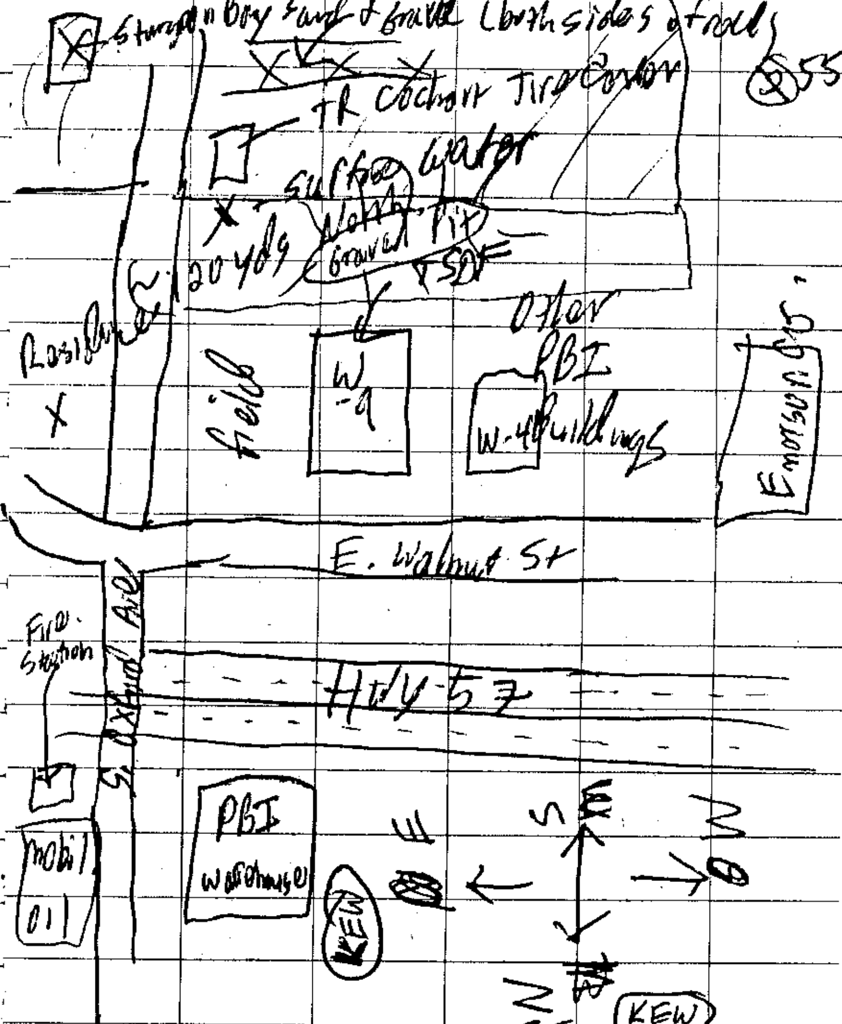
1416 - leave facility

D.G.S.

K. Whitman (1) 54

04/22/92
Peterson Builders Inc.
107 East Walnut St.
Sturgeon Bay, Wisconsin
USEPA ID # WID 006 628 975
PRC staff: Kurt Whitman and Scott Storlid
1228 Arrived at Peterson Builders (Peterson).
To the west of the facility is E. Walnut St and then Hwy 57 (4 lane). Across from Hwy 57 is West side Fire Station, Socony Mobil Oil Company oil/fuel storage depot + PBI warehouse on south side
See diagram on next page
To the East is Sturgeon Bay Sand & Gravel,
To the South is Emerson Electric Co.
To the North is a field + Oxford Ave

(2) 55



1239 hrs PIC1 SE exposure of W-9 warehouse of PBI storage facility K. Whitman
Temperature 39°F, winds 5-10 out of southeast, overcast drizzle

56 (3)

NO visible stains outside of the WA warehouse

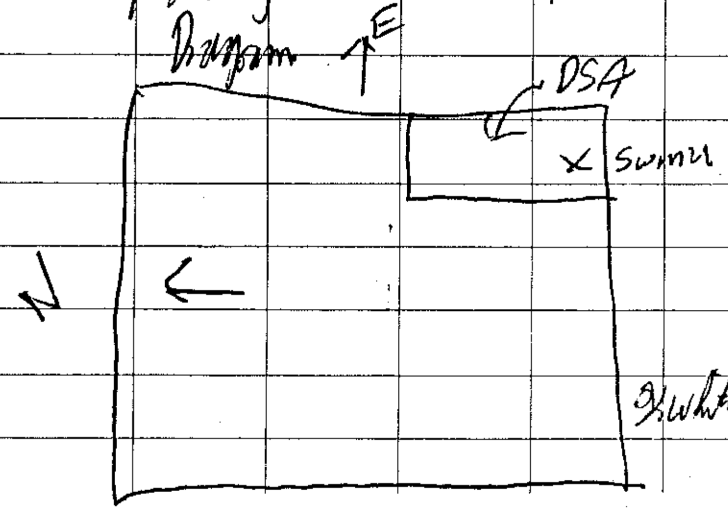
1255 hrs. Met with facility representatives Tom Anders & Rich Propsom

Most of warehouse area is used for product storage of flammables

1300 hrs PIC 2 of Freon still that was used when PBI had a licensed TSDF
TSDF (former)
Epoxy sealed concrete floor
Ventilation in SW corner
1 Drum of methylene chloride (F002)
K. Whitmore

57 (4)

1 drum circuit board cleaner washwater (D002) (D007, D008)
1 drum epoxy washwater waste (non-haz) and 2 drums cutting oil (H2O based)
Floors sunken, Berm separates TSDF from storage product
PIC 3 1302 Picture of 4 drums of waste.
1 drum hazardous & 3 drums non hazardous as indicated above
Sprinkler system. Fire extinguisher
Metal sided bldg. w/ concrete floor. Limited access w/ sliding door on north
Diagram



K. Whitmore

Warehouses
DSA square footage of former TSDF
1313 # of 15 an average of 35 employees
Meeting Plant 2 which also
falls under this ID #
Total of 20.9 acres including
vacant land & bone yard
~~[illegible]~~

Lessors - 1) Micro lift - water
purification equipment design (SDG)
2) Marine travel lift.
Spray Paint operation
<250 gallons of
Paint used. For
fire engines - Subcontract
for Pierce Mfg
Marine Travel lift went through an
air permit process and were found
[signature] Whitman

exempt

3 areas of production for
this ID #.
Manufacturing of fiberglass
components and assembly.
Historical perspective is that
they manufacture 30-40'
fiberglass boats & Aircraft
Pay major manufacturer before
1985, started in 1970's.
Fiberglass comes into facility
in rolls & are cut to size
Rerolled & staged for assembly
in Bldg 85
Cut wood & assembled aluminum
masts
1322 hrs Fiberglass waste is stored here
for reuse in patching etc.
[signature] Whitman

1327 Aluminum Dip Tank.
Desmutter using Fluoboric
acid + the PIC 4 taken of
this sump. Was
Phosphoric Acid before November
1991. Fluoboric Acid used after
Nov. 1991. Drain (trench)
is next to Desmutter tank
Water piped into trenches.
Scale present in trench
1327 PIC 5 of Desmutter trench
w/ residue (off white to
gray)

1328 Microlift. No sumps or
AVO's observed. They use a
dissolved air flotation equipment

[signature]

Marine travel lift uses
paints & solvents (xylene)
Ventilation to outside is
blocked off (northend of bldg.
1334 Also use a misc steam cleaner
concrete to clean products
Another Facility of Marine Travel
Lift handles hazardous waste.
All drums in this area
are product
1336. PBI Warehouse W 5
is an area where they
have fiberglass molds
setup. Use the
cut sheets and
assemble on molds
using epoxy & polyester resins.
Dioctyl phthalate is used for a
Dye conditioner / plasticizer for
hoses & products. [signature]

1334. Wastes generated at W-5.
are Dibasic ester of ? (DBE)
Acetone & methylene chloride
Some residual resins from
cleanout of guns (resin) in
methylene chloride
VOC emission air permit?

1 Drum MeCl₂
1 Drum Dioctyl Phthalate
1 Drum M-Pyrol
1 Drum non hazardous DBE
1342 PIC 6 (NW) taken of
swmu for the above four
drums located in NW corner
of bldg. W-5.
Methylene chloride has a generator
accumulation start date of 10-15-91.
the drum is full. Dioctyl
D. Whitson

phthalate has generator accumulation
start date of 3-28-91.
Concrete floor w/ metal
sided bldg. No floor drains
at this location

1352 PIC 7 Picture (SE)
of burned wood pile.
Current practice is to
haul all wood directly to
land fill. No liners. On soil/gravel.
1353 PIC 8 of raw material
storage yard. Covers about
10-12 acres ("outside" pole yard)
1355 PIC 9 SW exposure of
Wood Ash pile & storage of
raw material
Storm water flows North &
Northeast
D. Whitson

1415 END PA/VSI. Cleared w/ facility representative on what questions they would have. They had none.

Kent Whitmore 4-22-92

Kent Whitmore 4-24-92

BEFORE THE
DEPARTMENT OF NATURAL RESOURCES

In the Matter of Establishing)
Latest Available Control Techniques)
and Operating Practices for)
Peterson Builders, Inc., 107 East Walnut)
Street, Sturgeon Bay, Wisconsin) ORDER

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

Findings of Fact

The Department finds that:

1. Peterson Builders, Inc., is located at 107 East Walnut Street, Sturgeon Bay, Wisconsin.

2. Peterson Builders, Inc., proposes to operate a fiberglass tank manufacturing operation as described in an air pollution control permit application dated May 17, 1989.

3. The volatile organic compound (styrene) emissions from the fiberglass tank manufacturing operation will not exceed 18.64 tons per year.

4. This fiberglass tank manufacturing operation is subject to the emission limitations of Section NR 424.03(1), Wisconsin Administrative Code, which requires that organic compound emissions be controlled by 85%. If Peterson Builders, Inc., demonstrates that 85% control is technologically infeasible, the organic compound emissions from the fiberglass tank manufacturing operation must be controlled using latest available control techniques and operating practices demonstrating best current technology.

5. Peterson Builders, Inc., has demonstrated that 85% control is technologically infeasible for this process due to excessive costs of add-on controls.

6. The Department of Natural Resources has determined that latest available control techniques and operating practices for the proposed fiberglass tank manufacturing operation is the use of fabric filter system to control styrene emissions and limiting the total maximum usage of resin to 126.5 pounds per hour. Also the usage of resin consisting of 35% styrene and the weight percentage that volatilizes may not exceed 12%.

7. Peterson Builders, Inc. shall keep and maintain records of the amount of resin used and make it available for inspection to Department personnel on request during regular business hours.

8. Peterson Builders, Inc., will take all necessary corrective measures to minimize odors in case an objectionable odor occurs.

Conclusions of Law

he Department concludes that:

1. The Department has the authority under Section 144.31(1), Wisconsin Statutes to promulgate rules to establish emission limitations.

WID 096 828 975

U.S. ENVIRONMENTAL PROTECTION AGENCY

TECHNICAL ENFORCEMENT SUPPORT
AT
HAZARDOUS WASTE SITES

TC Site Visit Report for the July 16, 1992 Inspection Conducted at:

Peterson Builders, Inc.
Sturgeon Bay, Door County, Wisconsin

Work Assignment No. R05070

CONTRACT NO. 68-W9-0007
TES X

Metcalf & Eddy, Inc.

1 Pierce Place, Suite 1500W
Itasca, IL 60143-2641

August 1992

TC SITE VISIT REPORT

Date: July 16, 1992

To: Peterson Builders Inc., Sturgeon Bay, Door County, Wisconsin, WDNR District: Lake Michigan

From: Scott Turek, Metcalf & Eddy, Inc.

Subject: Site Visit Report for the TC Inspection of July 16, 1992

On Thursday, July 16, 1992, an unannounced Toxicity Characteristic Rule (TC) inspection was performed by Metcalf & Eddy, Inc. (M&E), at Peterson Builders Inc., located at 625 Oxford Street, Sturgeon Bay, Door County, Wisconsin. The inspection was conducted under the Technical Enforcement Support (TES X) Contract, Work Assignment No, R05070, for the U.S. Environmental Protection Agency (U.S. EPA), Region V. The facility was represented by Mr. Tom Anders, Manager of Environmental Affairs, and the U.S. EPA was represented by Mr. Scott Turek of M&E.

Inspection Findings

Peterson manufacturers ships and marine related products. Peterson Builders Inc. (Peterson) has operated at the above referenced location since its inception in 1933. The address given is for a warehouse whose actual address is 245 Vine Street. Peterson's operation is spread out through Sturgeon Bay and consists of 2 plants and numerous warehouses. The address for the main office and Plant 1 is 101 Pennsylvania Street, P.O. Box 650. Plant 2 is located on East Walnut Street. The company occupies 21 acres and employs just under 1,000 people. The warehouse at 245 Vine Street occupies less than 2 acres.

RCRA Status

Peterson has two U.S. EPA ID numbers. Plant 1's number is WID006139349 and Plant 2's number is WID096828975. Both Plants 1 and 2 are currently generators only. Plant 2 went through storage closure in October 1991. A U.S. EPA ID number was assigned to the warehouse at 245 Vine Street in May 1990 to dispose of some off spec materials. The ID number was withdrawn in March 1992. The warehouse contains dry materials and two steel cutting (burning) machines.

No hazardous waste activity was observed during the inspection of the warehouse. No sampling was conducted.

Conclusions/Recommendations

Peterson's status as a generator has not changed as a result of the promulgation of the Toxicity Characteristic Rule. No further action is recommended at this time due to the fact that they have U.S. EPA ID numbers for their two plants and hazardous wastes are not generated in the warehouse.

Site: Peterson Builders Inc
Date: 7/16/92
Weather: Rainy ~75°F
Arrival Time: 9:15 AM
Departure Time: 11:00 AM

Site Representatives	Position
Tom Anders	Manager of Env. Affairs

Owner: Ellsworth Peterson.

Address + phone number 101 Penn. St. P.O. Box 650
Sturgeon Bay, WI 54235-0650
(414) 743-5574

People employed under 1000

Size of property 21 acres. not more than 2

Year started operation 1933.

What do you manufacture
ships & marine related products

Explain the process

What materials do you use

Non-hazardous waste generated Amount

Non-hazardous waste disposal

Hazardous waste generated Amount

Hazardous waste disposal

Waste oil management

Transportation of products, wastes, who, where

Has your processes changed through the years

Empty drums

Any solvents or degreasers used

Copies of MSDS's

Manifests or analytical results of waste shipped out

Hazardous Waste Generator numbers
Plant 1 (101 Pennsylvania) WID 006139349
Plant 2 (East Walnut) WID 096828975
↑TSDF closed oct 1991
245 Vine St.
625 Oxford is a warehouse (dry materials) with burni
mach
ose to house off spec materials which were considere
a waste determination.
Its US EPA ID number was withdrawn in March 199

They received an ID # to get rid of some old off-sp
material.

Photos 22 10:50 SW Panorama of building at
23 10:50 W 625 Oxford Ave.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

OCT 18 1988

DON JOHNSTON ENV CDR
PETERSON BUILDERS INC PLT 1
P O BOX 650
STURGEON BAY WI 54235

RE: EPA ID #: WID006139349

In response to your request of SEP 02 1988 the following information has been updated:

NAME INSTL: PETERSON BUILDERS INC PLT 1
CONTACT: JOHNSTON DON ENV CDR
ADR P O BOX 650

ADDED ACTIVITY: TRANSPORTER - HWT

If you have questions, please contact Sharon Kiddon at (312)886-6173.

Sincerely,

Arthur S. Kawatachi
Information Section
RCRA Program Management Branch

cc: State Agency
File -

Recvd 10/26/88
PJ

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

April 22, 1991

Peterson Builders, Inc
Attn: Don Johnston
P O Box 650
Sturgeon Bay Wisc 54235

Dear Notifier:

Our records indicate that two United States Environmental Protection Agency (US EPA) Identification (ID) numbers were issued to the location of:

CORNER OF WALNUT AND LANSING, STURGEON BAY, WI

The correct US EPA ID number for this location is: WID 096 828 975 .

DO NOT USE US EPA ID number WID 980 898 399 . This number has been inactivated.

If you have questions, please contact Ms. Sharon Kiddon at (312) 886-6173.

Sincerely yours,

Arthur S. Kawatachi
Information Section
Office of RCRA

cc: State Agency
File

Peterson Builders, Inc.
SHIP DESIGNERS AND BUILDERS
STURGEON BAY, WISCONSIN 54235-0650
101 Pennsylvania Street, P.O. Box 650
(414) 743-5574
TELEX 26-3423

7 May 1990

Mr. Len Polczinski
WI Dept of Natural Resources
Lake Michigan District Headquarters
P.O. Box 10448
Green Bay, WI 54307-0448

Dear Mr. Polczinski:

Enclosed is a copy of a completed Notification of Hazardous Waste Activity form for PBI's Warehouse #8. The notification is being made for the one-time disposal of old, off-specification materials that were left behind by the building's previous owner.

If you have any questions about this matter, please contact me. My extension is 248.

Sincerely,

Don Johnston
Environmental Coordinator

DJ/ss
Encl (1)
cc: U.S. EPA Region V w/encl.

Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

For Official Use Only

Comments

C C

Installation's EPA ID Number | Approved | Date Received *(yr. mo. day)*

C F | T/A C 1

I. Name of Installation

PETERSON BUILDERS INC.

II. Installation Mailing Address

Street or P.O. Box

C 3: PO BOX 650

City or Town | State | ZIP Code

C 4: STURGEON BAY | WI | 54235

III. Location of Installation

Street or Route Number

C 5: 245 VINE STREET

City or Town | State | ZIP Code

C 6: STURGEON BAY | WI | 54235

IV. Installation Contact

Name and Title *(last, first, and job title)* | Phone Number *(area code and number)*

C 2: JOHNSTON DON ENVCRD | 414 743 5577

V. Ownership

A. Name of Installation's Legal Owner | B. Type of Ownership *(enter code)*

C R: PETERSON BUILDERS INC | P

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- [X] 1a. Generator
- [ ] 1b. Less than 1,000 kg/mo. (one time disposal of materials)
- [ ] 2. Transporter
- [ ] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es)*

- [ ] A. Air
- [ ] B. Rail
- [ ] C. Highway
- [ ] D. Water
- [ ] E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [X] A. First Notification
- [ ] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number

State of Wisconsin
Department of Natural Resources

HAZARDOUS WASTE STATUS CHANGE FORM

Form 4430-12 1-90

NOTE: Compliance Evaluation Inspection Form and CME Form (Form 4430-5) must accompany this form.

Submission of this form is voluntary.

A. GENERAL INFORMATION (WDNR USE ONLY)

Facility Name (As shown in current EPA Notification Printout)	EPA ID Number / FID Number
Patrick Plastics Inc.	WID 981571638 / 441519520
Facility Location	Notification Status (As shown in current EPA Notification Printout) (Circle all that apply)
245 N 12th St.	LQG SQG VSQG TRANS TSD
City, State, Zip Code	Other
Sheboygan Falls WI 53085	
Compliance Evaluation Inspection Date	
3-19-92	
WDNR Specialist Name/Telephone Number	
Carol Schmidt (414) 492-5871	

B. STATUS CHANGE INFORMATION - TO BE COMPLETED BY FACILITY (Check all that apply):

Change This Facility's Notification Status To:

☒ 1. NON-HANDLER
This facility does not generate, transport, treat, store or dispose of any hazardous waste, and does not intend to conduct such activities in the futur

☐ 2. VERY SMALL QUANTITY GENERATOR
This facility is a very small quantity generator of hazardous waste. This means that we generate less than the following per any calendar month: (1) 100 kg or 220 lbs of hazardous waste, (2) 1 kg or 2.2 lbs of acute hazardous waste, and (3) 100 kg or 220 lbs of acute hazardous waste spill cleanup material; and accumulate less than the following at any time: (a) 1,000 kg or 2,205 lbs of hazardous waste, (b) 1 kg or 2.2 lbs of acute hazardous waste, and (c) 100 kg or 220 lbs of acute hazardous waste spill cleanup material. We intend to meet these generation and accumulatio requirements in the future.

☐ 3. SMALL QUANTITY GENERATOR
This facility is a small quantity generator of hazardous waste. This means that we generate less than the following per any calendar month: (1) 1,000 kg or 2,205 lbs of hazardous waste, (2) 1 kg or 2.2 lbs of acute hazardous waste, and (3) 100 kg or 220 lbs of acute hazardous waste spill cleanup material; accumulate less than the following at any time: (a) 6,000 kg or 13,230 lbs of hazardous waste, (b) 1 kg or 2.2 lbs of acute hazardous waste, and (c) 100 kg or 220 lbs of acute hazardous waste spill cleanup material; and accumulate this waste in containers or above-ground tanks for less than 180 or 270 days (depends on distance waste is transported). We intend to meet these generation and accumulation requirements in the future.

☐ 4. LARGE QUANTITY GENERATOR
This facility is a large quantity generator of hazardous waste. This means that we generate more than the following per any calendar month: (1) 1,000 kg or 2,205 lbs of hazardous waste, (2) 1 kg or 2.2 lbs of acute hazardous waste, or (3) 100 kg or 220 lbs of acute hazardous waste spill cleanup material; and accumulate this waste in containers or aboveground tanks for less than 90 days. We intend to meet these generation and accumulation requirements in the future.

☐ 5. TRANSPORTER
This facility transports hazardous waste by air, rail, highway or water.

☐ 6. TREATER/STORER/DISPOSER
This facility treats, stores for greater than 90 days, and/or disposes of hazardous waste on-site.

☐ 7. OTHER: This facility is_____.
This category may be used for facilities involved with Waste-As-Fuel, Used Oil, etc. activities, Non-Regulated Installations (as indicated in columns 1 or 11-14 in the EPA Notification Printout), or other. Please explain.

C. CERTIFICATION:

The following certification must be signed by the owner or operator of the facility, or on behalf of the owner or operator, by an individual who meets the requirements of s. NR 181.55(3)(b) or s. NR 680.05(2)(b), Wis. Adm. Code.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted, is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Owner and/or Operator (Print or type)	Signature	Date
Thomas D. Anders	Thomas D Anders	17 MAR 92
Title	Telephone Number (Include area code)	
Manager of Environmental Affairs	(414) 743-5574 EXT 248	
Mailing Address (If different than above)	City, State, Zip Code	

Copy 1 - HW-SW/3, Copy 2 - District, Copy 3 - U.S. EPA, Copy 4 - Facility, Copy 5 - Area.

TOTOL P.01

— Bootmakers —

Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

4480

Please refer to the instructions for completion before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

C/C N — MAY 17 1990

Installation's EPA ID Number — Approved — Date Received

C/F WID988577839 — C/1 A — 900510

COPY

I. Name of Installation

C/2 PETERSON BUILDERS INC.

II. Installation Mailing Address

Street or P.O. Box

C/3 PO BOX 650

City or Town — State — ZIP Code

C/4 STURGEON BAY — WI — 54235

III. Location of Installation

Street or Route Number

C/5 245 VINE ST [illegible]

City or Town — State — ZIP Code

C/6 STURGEON BAY — WI — 54235

IV. Installation Contact

Name and Title *(last, first, and job title)* — Phone Number *(area code and number)*

C/7 JOHNSTON DON ENV/COORD — 414 743 5577

V. Ownership

A. Name of Installation's Legal Owner — B. Type of Ownership *(enter code)*

C/8 PETERSON BUILDERS INC — P

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- [X] 1a. Generator
- [ ] 1b. Less than 1,000 kg/mo. (one time disposal of materials)
- [ ] 2. Transporter
- [ ] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

RECEIVED MAY 11 1990 U.S. EPA, REGION V SWB — PMS

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es))*

- [ ] A. Air
- [ ] B. Rail
- [ ] C. Highway
- [ ] D. Water
- [ ] E. Other *(specify)*

0334 = Door

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [X] A. First Notification
- [ ] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number

P51915 pmg

SHIPBUILDERS
Steel - Aluminum - Wood
Fiberglass

TOM ANDERS
Environmental Manager

PETERSON BUILDERS, INC.
101 Pennsylvania Street
P.O. Box 650
Sturgeon Bay, WI 54235-0650
(414) 743-5574 Ext. 248
Telex 26-3423 FAX (414) 743-4784

SHIPBUILDERS
Steel - Aluminum - Wood
Fiberglass

RICH PROPSOM
Environmental Engineer

PETERSON BUILDERS, INC.
101 Pennsylvania Street
Sturgeon Bay, WI 54235
(414) 743-5577 Ext. 450
FAX (414) 743-3450

Photo No.:	1
Facility:	Peterson Builders, Inc.
Location:	Sturgeon Bay, Wisconsin
WDNR District:	Lake Michigan
Photographer:	Scott Turek
Camera:	Canon GIII
Film:	Kodak ISO 200
Date:	July 16, 1992

Facility's structure at 625 Oxford Avenue.

Photo No.:	2
Facility:	Peterson Builders, Inc.
Location:	Sturgeon Bay, Wisconsin
WDNR District:	Lake Michigan
Photographer:	Scott Turek
Camera:	Canon GIII
Film:	Kodak ISO 200
Date:	July 16, 1992

Facility's structure at 625 Oxford Avenue.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

March 30, 1992

Tom Anders, Environmental Affairs Manager
Peterson Builders, Inc.
101 Pennsylvania Street
P.O. Box 650
Sturgeon Bay, Wisconsin 54235-0650

Re: Visual Site Inspection
Peterson Builders, Inc.
Sturgeon Bay, Wisconsin
ID No. WID 096 828 975

Dear Mr. Anders:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for 8:00 a.m. on Wednesday, April 22, 1992. The inspection team will consist of Kurt Whitman and Scott Storlid of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Wisconsin Department of Natural Resources

(WDNR) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Mark Gordon, WDNR

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

January 8, 1987 IN REPLY REFER TO: 4421 3

Peterson Builders, Inc.
107 East Walnut Street
Sturgeon Bay, WI 54325

SUBJECT: EPA ID Number WID 096829975

Facility Contact: Mr. John Beales
Peterson Builders, Inc.
P.O. Box 47
Sturgeon Bay, WI 54325-0047
Phone (414) 743-5574

Permit Status: Peterson Builders, Inc. (PBI) operates under an interim license granted on April 27, 1983 and a RCRA Permit granted on August 6, 1984 later modified on September 30, 1986. PBI operations began on May 19, 1980. The Notification of Hazardous Wastes Activity Form was submitted on November 19 1980. U.S. EPA received the Part A Application on July 27, 1981. A letter included with the Part A requested that PBI be classified as a generator, transporter, and treatment/storage/disposal facility. A consent agreement was signed on July 29, 1982 (and sent out August 2, 1982) which addressed and rectified PBI's late filing of their Part A Notification of Hazardous Waste Activity. Part B Application was received on February 28, 1983. A submittal of additional information on April 20, 1983 modified and completed the Part A Application. An interim license for storage was granted on April 27, 1983. An August 30, 1984 letter notified the Department that PBI had decided to change the primary paint used from toluene to xylene. The Department notified PBI (September 5, 1984) that this change in solvent use warranted the modification of the Part A modification (regarding chemical and physical waste analysis).

A revised Part B, submitted in November 1985, addressed additional wastes handled, the new solvent recovery still, and an increased storage capacity. Necessary modifications to closure bonds, contingency plans, secondary containment designs have all been changed accordingly. On September 30, 1986 U.S. EPA notified PBI that this Part B modification was approved.

Summary of Corrective Action Review

PBI is primarily a manufacture of large boats and ships, but also manufactures trucks used in the air transport industry. Presently permitted to store various halogenated and nonhalogenated solvents, PBI generates hazardous waste primarily from paint equipment clean-up and fiberglassing equipment clean-up.

A number of chemicals are currently used in these clean-up processes including: acetone (F003), Methyl Ethyl Ketone (MEK, F005), methylene chloride (F002), xylene (F003), toluene (F005), and Di-N-Octyl Phthalate. All wastes, except for Di-N-Octyl Phthalate, are flammable and recycled by PBI with a distillation process. The still residue has been found to be flammable and is therefore a hazardous solid waste. This facility additionally handles off-site wastes generated from other nearby PBI operations. This facility is presently licensed to store 5,500 gallons of waste (100 55-gallon drums). Original storage capacity was for 50 drums, but this was modified with a subsequent Part A on October 15, 1985.

The facility at 107 East Walnut Street is primarily a storage warehouse for hazardous waste which are generated at two other PBI facilities in Sturgeon Bay. This facility has been issued a few NONs in 1983, 1984 and 1985 (training records, storage logs, etc.) but presently has no outstanding NONs or NOVs. There have been no recorded or known spills or public complaints at this facility.

This facility is not environmentally significant.

8915V

Attachment 19 (Revised 1/15/86)
(New Version) DNR rec'd 4/3/86

Name of Preparer: JONATHAN KOPCOS
Date: 12/23/86

Model Facility Management Plan

1. Facility Name: Peterson Builders, Inc.
2. Facility I.D. Number: WID 096528975
3. Owner and/or Operator: Peterson Builders
4. Facility Location: 107 East Walnut St.
   Street Address

   Sturgeon Bay (City) Door (County) WI (State) 54235 (Zip Code)

5. Facility Telephone (if available): (414) 743-5574

6. Recommendation for Regional Approach to the Facility: Check one

   _____ Site Investigation NA
   _____ Permit Compliance Schedule
   _____ Corrective Action Order (may include compliance schedule)
   _____ Other Administrative Enforcement
   _____ Federal Judicial Enforcement
   _____ Referral to CERCLA for Federally Financed or Enforcement Activity
   _____ Voluntary/Negotiated Action
   _____ State Action

Brief narrative in explanation of selection: _____

a) If site investigation alternative is selected: NA

anticipated inspection date _____

State or Federal inspection _____

b) If Permit Alternative is Selected: Projected Schedule NA

Date of Part B Submission: _____

Date of Completeness Check: _____

Date for Additional Submissions (if required): _____

Date of Completion of Technical Review: _____

Completion of Draft Permit/Permit Denial: _____

Public Notice for Permit Decision: _____

Date of Hearing (if appropriate): _____

Date of Final Permit or Denial Issuance: _____

Description of any corrective action provisions to be included in permit -

1. Plan of Study of Remedial Investigation: _____

_____

2. Remedial Investigation Report/Corrective Action Plan Cost Estimate/Financial Mechanism: _____

_____

3. Completion of Corrective Action: _____

_____

c) If Corrective Action Order Alternative is Selected: NA

Estimated Date for Order Issuance: _____

Description of Provisions of the Order to be Completed by Facility: _____

_____

_____

Description of Compliance Schedule to be Contained in Order:

_____

_____

_____

d) If Other Administrative Enforcement Action is Selected: NA

Projected Date for Issuance of the Order: _____

Description of Provisions or Goals of the Order: _____

_____

_____

e) If Judicial Enforcement Alternative Selected: NA

Date of Referral to Office of Regional Counsel: _____

f) If Referral to CERCLA for Action Selected: NA

Date of Referral to CERCLA Sections: _____

g) If Voluntary/Negotiated Action Alternative if Selected: NA

Date of Initial Contact with Facility: _____

Description of Goals of Contact or Discussions with Facility: _____

_____

_____

_____

Date for Termination of Discussions if Not Successful:

_____

Date of Finalization of Settlement if Negotiation Successful:

_____

h) If State Action Alternative is Selected: NA

Date for Referral to State: _____

Name of State Contact: _____

Phone: _____

7. EPA Concurrence (to be completed by Region V, TPS staff)

(Check one)

☐ A corrective action order (or other enforcement action) was recommended, and HEEB concurs.

☐ No enforcement action was recommended, and HEEB did not object.

☐ Enforcement action was recommended, but HEEB did not concur at this time; we have revised the FMP accordingly.

(Check one)

☐ Action involving ERRB was recommended, and ERRB concurs.

☐ No ERRB action was recommended, and ERRB did not object.

☐ Action involving ERRB was recommended, that ERRB did not concur; we have revised the FMP accordingly.

(Check one)

☐ Based on our review, the FMP is hereby approved as drafted by DNR.

☐ Based on our review, the FMP is hereby approved as amended.

Signature _____ Date: _____
(EPA Staff)

CERTIFICATION REGARDING POTEN L RELEASES FROM SOLID WASTE MANAGEMENT UNITS

Q8

FACILITY NAME: Peterson Builders, Inc.

EPA I.D. NUMBER: WID 096828975

LOCATION CITY: Sturgeon Bay

STATE: Wisconsin

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill		X
• Surface Impoundment		X
• Land Farm		X
• Waste Pile		X
• Incinerator		X
• Storage Tank (Above Ground)		X
• Storage Tank (Underground)		X
• Container Storage Area		X
• Injection Wells	X	
• Wastewater Treatment Units		X
• Transfer Stations		X
• Waste Recycling Operations		X
• Waste Treatment, Detoxification	X	
• Other		X

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

PBI has a container storage area where used solvents and the still bottoms of recycled solvents are accumulated for shipment to incineration. PBI has a still for recycling flamable solvents. All involved materials are hazardous wastes as described in the permit application.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

095-60

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

No known current or past releases.

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

JOHN L. BEALES, HAZARDOUS WASTE MANAGER
Typed Name and Title

Signature

4 February 1986
Date

REV 8-1-85